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June 2, 2005

Mr. Robert Alba
Clerk to District Judge Hon. Patti B. Saris
U.S. District for the District of Massachusetts
John Joseph Moakley U.S. Courthouse
Boston, MA 02210

Re: Converse, Inc. v. Alon International, S.A.
Docket No. 04-12591-PBS

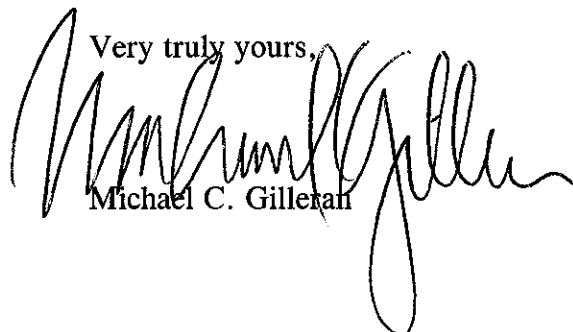
Dear Mr. Alba:

I received this morning from Richard Johnston, a draft of the proposed order of Alon terminating or vacating the Status Quo Order. I sent my comments by email to Attorney Johnston. Since that time I have not heard from him; I attempted to contact him and was told that he was out of the office. I tried to contact his co-counsel, Cynthia Vreeland, but was only able leave a message in her voice mailbox. The essence of my email comments to Attorney Johnston was that Judge Saris simply vacated the order, as indicated by the clerk's docket notes of the hearing. Please regard this as Converse's objection to the order as proposed by Alon.

Alon's proposed order, a copy of which is attached, makes it appear that Converse argued for the extension of the Status Quo Order, that arguments on the merits of the Status Quo Order were heard, and only then did Judge Saris "adjudge[d]" the matter before vacating the order. The proposed order is not an accurate reflection of what happened and Converse fears that it will be used to prejudice Converse in the Brazilian courts. At the hearing yesterday, Converse withdrew any request for relief, and so there was no "hearing" on the Status Quo Order, or on whether it should continue, and the court did not adjudge the matter. In fact, Judge Saris indicated that the Status Quo Order expired of its own terms when she returned to the bench on Tuesday, June 1, 2005.

The order to be entered should simply read: "The Court hereby vacates the order of Judge Tauro entered on May 27, 2005."

Very truly yours,



Michael C. Gilleran

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June 1, 2005

VIA FACSIMILE

Michael H. Gilleran, Esq.
Pepe & Hazard LLP
150 Federal Street
Boston, MA 02110


Re: Converse, Inc., v. Alon International, S.A.

Dear Michael:

Enclosed is the proposed Order which we discussed today with Judge Saris in the above-referenced matter. Please provide me with any comments.

Very truly yours,

WILMER CUTLER PICKERING
HALE AND DORR LLP

By: 

Richard A. Johnston, Partner

RAJ/bjg
Enclosure

cc: Jose I. Astigarraga, Esq.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CONVERSE, INC.,

Plaintiff,

v.

ALON INTERNATIONAL, S.A.,

Defendant.

Civil Action No. 04-12591-PBS

ORDER

June 1, 2005

SARIS, J.

On May 27, 2005, Judge Joseph L. Tauro entered an Order (hereinafter denominated the “Status Quo Order”) providing that “[t]he Parties shall maintain the status quo with respect to all aspects of this case until Judge Saris returns, or further order of this court.” This Court conducted a hearing on June 1, 2005 at which both Converse, Inc. and Alon International, S.A. were represented by counsel. Upon hearing, it ordered and adjudged that the Status Quo Order is hereby vacated and is of no force or effect.

IT IS SO ORDERED.

United States District Judge